

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

TROY KARPOVICH, as guardian of
MICHAEL R. KARPOVICH, a legally-
incapacitated person,

Plaintiff,

Case No. 2:18-cv-12247-SFC-DRG

Honorable Sean F. Cox

v.

CITY OF DETROIT, et. al

Defendants.

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Defendant Detroit's Response to Court Order on Plaintiff's Motion to Compel, ECF No. 51:

Defendant's City of Detroit, James E. Craig and Detroit Board of Police Commissioners submit the following response to the Court's Order of June 18, 2019, ECF No. 51 as follows:

1. The "Evidence Folder" is comprised of various items compiled by the Homicide Task Force who investigated this matter.
2. Defendants have supplemented the "Box" data base with all the documents in its possession.
3. Defendants have relied on the Law Department legal assistant staff to assemble the data base, specifically Andrea Keenan for technical support. It is the Defendant's intent to convert the audio files of Pace, Anderson, Thomas and Jefferson a different software to allow easier access to the files.
4. In response to the paragraph entitled "Document Request #2" there is no separate "Internal Controls" investigative file for this incident. The documents uploaded to the data base from Internal Affairs and the Homicide Task Force are the official investigation of this matter. Some of the items in the data base were assembled from the Police Department personnel files.
5. In response to the paragraph entitled "Document Request #7" the defendants have made a thorough search of the documents specified, "from 2014 to

2019 for use-of-force incidents involving (1) off-duty officers, and (2) alleged physical altercations with officers other than those involving a firearm, a vehicle, or a person in custody.” and have no documents responsive to this request.

6. In response to the paragraph entitled “Document Request #10”, based on information and belief the “voicemail” in the data base is a recording extracted from the cell phone records of Timothy Leach and record the voice of an unknown employee of Ottawa Via.

Respectfully submitted,

/s/Edward V. Keelean (P29131)
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Dated: June 28, 2019

Proof of Service

I hereby certify that on June 28, 2019, I electronically filed the foregoing pleading with the Clerk of the Court using the courts electronic filing system which will send notification of such filing to counsel of record.

/s/ Edward V. Keelean

